

May 9, 2024

Patrick Sanders  
MacGill PC  
156 E. Market St.  
Suite 2200  
Indianapolis, IN 46204

Re: Hunt v. Southern Baptist Convention, et al

Dear Mr. Sanders,

Per your request, this letter details the forensic imaging process and subsequent analysis of an iPhone 13 belonging to your client Dr. Johnny M. Hunt.

### **Forensic Examiner Background**

My name is Jason Miller and I am a Senior Consultant in the Forensics and Expert Services group with Consilio, LLC (“Consilio”). Consilio is a global provider of eDiscovery, document review, risk management, digital forensics, and legal consulting services. As part of the Digital Forensics and Expert Services (“DFES”) group, my duties include investigating and performing forensic data collections, data processing, and forensic examinations. I have been working in the digital forensic industry since 2018. I hold a Bachelor of Science degree in Digital Forensics (Bloomsburg University, 2018) and have worked on a variety of high-profile criminal and civil cases including Business Email Compromise Investigations, Corporate Espionage, Department of Justice Investigations, Medical Malpractice, and Corporate Mergers.

### **Collection/Analysis/Results**

On April 15<sup>th</sup>, 2024, Consilio received a package with tracking number 1Z29R12R0190226104 from UPS. This package contained an iPhone 13, with a serial number of [REDACTED] and a model number of A2482 (ML933LL/A) (“Device”). The Device’s installed operating system was iOS 17.3.1, and 64.95 GB of the Device’s 128GB capacity contained data.

On April 16<sup>th</sup>, 2024, I created a forensic image of the Device with Cellebrite UFED 4 PC, version 7.68.0.809. On April 20<sup>th</sup>, 2024, Consilio used Elcomsoft Phone Breaker software, version 10.13, to forensically collect iCloud backups of the Device contained in your client’s iCloud account with username [REDACTED]@gmail.com. Consilio located two (2) iCloud backups of the Device and downloaded the data from these backups and loaded it into Cellebrite’s Physical Analyser software, version 7.66.0.9, for review. No unique text messages were in either of the Device’s iCloud backups. WhatsApp and Skype messages duplicative to the forensic image, were located.

On April 22<sup>nd</sup>, 2024, I took steps to create a second forensic image to ensure any additional text messages which were stored on the user's iCloud account, were captured. The process involved accessing the Device's settings, navigating the iCloud section, and then disabling the "Messages in iCloud" feature,<sup>1</sup> which causes all text messages currently stored in the user's iCloud account to download onto the Device. Due to the characteristics of the Device, after the "Messages" feature was disabled, I waited approximately one hour between disabling the "Messages" feature and re-imaging the Device, to allow adequate time for download. The second forensic image was also created with Cellebrite UFED 4 PC, version 7.68.0.809.

The second forensic image was loaded into and reviewed using Cellebrite's Physical Analyzer software, version 7.66.0.9. The review showed the Device contained 24,656 text messages. All text messages were then exported into a Universal Forensics Extraction Device (UFDR) report and turned over to our eDiscovery team for processing. All other data on the Device, except for the Device information, was excluded from the export.

On April 30<sup>th</sup>, 2024, Consilio used Elcomsoft Phone Breaker software, version 10.13, to forensically collect all text message data stored in the iCloud sync data contained in your client's iCloud account with the username "[REDACTED]@gmail.com." Subsequently, Consilio collected 34,683 text messages. The text messages were then loaded into Elcomsoft Phone Viewer, version 5.4, and reviewed. During review, it was determined that approximately 19,062 of the 34,683 text messages appeared to contain only phone numbers as the text message content.

As stated, all forensic images were analysed for text messages. All text messages that were present were ultimately provided to the Consilio eDiscovery team for processing and loading into a Relativity Server workspace.

Sincerely,

  
Jason Miller

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<sup>1</sup> When the "Messages in iCloud" feature is enabled in the iCloud section of an iPhone's settings, messages can be removed from the device, and stored in the user's iCloud account. This action preserves space on the mobile phone, and ensure syncing across devices.